

**IN THE DISTRICT COURT OF THE U.S. VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

**In re The Complaint and Petition of
Costar Sailing, LLC, as Owner, and J&J
Yacht Services, LLC, as Owner Pro Hac
Vice/Operator, of The S/V Carpe Aura,
Hull #: FPA54253I819 and Official No.
1291579.**

Case No. 3:21-cv-059

Jury Trial Demanded

Edward and Cindy Morea,

Claimants and Third-Party Plaintiffs,

v.

Atlantic Cruising Yachts, LLC Fountain
Pajot, SA and Constantine Bakas,

Third-Party Defendants.

**DEFENDANT CONSTANTINE BAKAS' MOTION FOR ADMISSION *PRO HAC VICE*
OF DAVID A. SAFRANEK, ESQ.**

Defendant, Constantine Bakas, by and through undersigned counsel, hereby moves this court for admission *pro hac vice* of David A. Safranek, Esq. in the captioned proceeding and hereby states:

1. Attorney Safranek is an attorney with the law firm The Law Office of C. Jacob Gower, Esq., 1919 Pine Street, New Orleans, LA 70118, Telephone No.: (337) 298-9734, Email: david@gowerlegal.com. He has been admitted to practice law in Louisiana. A copy of the *Pro Hac Vice* Application of Attorney Safranek is attached hereto as Exhibit A.
2. Attorney Safranek is a member of good standing of the bars in the aforementioned jurisdiction and has not suffered any disbarment or suspension of license to practice. The Certificate of Good Standing is attached hereto as Exhibit B. The Declaration of David A. Safranek, Esq. in Support of Motion for Admission *Pro Hac Vice* is attached as Exhibit C.

3. In his capacity as an attorney, Mr. Safranek handles litigation and Dispute Resolution law.

4. The Defendant Constantine Bakas has requested that David A. Safranek, Esq. participate fully in the preparation and trial of this case.

As local counsel for the Defendant Constantine Bakas, I hereby recommend the admission of *pro hac vice* of David A. Safranek, Esq. subject to compliance with the Court Rules. The Affidavit of C. Jacob Gower, Esq. in Support of Motion for Admission is attached hereto as Exhibit D.

Respectfully submitted,

s/ C. Jacob Gower

C. Jacob Gower, Esq.

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Counsel to Constantine Bakas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this August 8, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send a notification of such filing through the Notice of Electronic Filing for parties and counsel who are Filing Users. I have also served a true and correct copy of this filing to the following via the email indicated below:

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s/ C. Jacob Gower
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